

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
COURT FILE NO.: 12 CV 2761 DSD/JJK**

Jennifer Caulfield,)	
)	
Plaintiff,)	
)	
v.)	EXPLANATION OF WHY DEPOSITION
)	WAS REASONABLY NECESSARY
American Accounts & Advisors, Inc.,)	
and John Doe,)	
)	
Defendants.)	

I am the attorney for Defendants in the above referenced matter. Defendants' motion for Judgment on the Pleadings was granted and Judgment was entered on May 13, 2013. The motion was heard on March 22, 2013. Plaintiff's deposition was held on February 27, 2013.

At the time of its taking, the deposition of Plaintiff was necessary in my representation of Defendants. Plaintiff would have, out of necessity, testified at any trial in this matter had this matter proceeded to trial.

MALACKO LAW OFFICE

Dated: May 13, 2013

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